

Court not decide this motion within the fourteen-day time period during which execution of the judgment is automatically stayed, *see* Fed. R. Civ. P. 62(a), Verizon requests that the Court further stay any enforcement until this motion is resolved.

Dated: August 12, 2011

Respectfully submitted,

**VERIZON COMMUNICATIONS INC.,
VERIZON SERVICES CORP.,
VERIZON VIRGINIA INC. and
VERIZON SOUTH INC.**

/s/

Gregory N. Stillman (VSB #14308)
Brent L. VanNorman (VSB #45956)
HUNTON & WILLIAMS LLP
500 East Main Street, Suite 1000
Norfolk, VA 23510
Telephone: (757) 640-5300
Facsimile: (757) 625-7720
gstillman@hunton.com
bvannorman@hunton.com

Brian M. Buroker (VSB # 39581)
Bradley T. Lennie (*Pro Hac Vice*)
Justin T. Arbes (*Pro Hac Vice*)
HUNTON & WILLIAMS LLP
2200 Pennsylvania Avenue, NW
Washington, DC 20037
Telephone: (202) 955-1500
Facsimile: (202) 778-2201
bburoker@hunton.com
blennie@hunton.com
jarbes@hunton.com

Henry B. Gutman (*Pro Hac Vice*)
Patrick E. King (*Pro Hac Vice*)
Noah M. Leibowitz (*Pro Hac Vice*)
Jason M. Bussey (*Pro Hac Vice*)
SIMPSON THACHER & BARTLETT LLP
425 Lexington Avenue
New York, NY 10017-3954
Telephone: (212) 455-2000

Facsimile: (212) 455-2502
hgutman@stblaw.com
pking@stblaw.com
nleibowitz@stblaw.com
jbussey@stblaw.com

John Thorne (*Pro Hac Vice to be submitted*)

VERIZON CORPORATE RESOURCES GROUP LLC

1320 North Courthouse Road
Arlington, VA 22201
Telephone: (703) 351-3900
Facsimile: (703) 351-3670
john.thorne@verizon.com

Leonard C. Suchyta (*Pro Hac Vice*)

John P. Frantz (VSB #41450)

Caren K. Khoo (*Pro Hac Vice*)

VERIZON CORPORATE RESOURCES GROUP LLC

One Verizon Way
Basking Ridge, NJ 07920
Telephone: (908) 559-5623
Facsimile: (908) 766-6974
leonard.suchyta@verizon.com
john.frantz@verizon.com
caren.khoo@verizon.com

Michael K. Kellogg (*Pro Hac Vice*)

Mark C. Hansen (*Pro Hac Vice*)

KELLOGG, HUBER, HANSEN, TODD,

EVANS & FIGEL, P.L.L.C.

1615 M Street, NW, Suite 400
Washington, DC 20036
Telephone: (202) 326-7900
Facsimile: (202) 326-7999
mkellogg@khhte.com
mhansen@khhte.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel of record:

Stephen E. Noona (VSB #25367)
KAUFMAN & CANOLES, P.C.
150 W. Main Street, Suite 2100
Norfolk, VA 23514
Telephone: (757) 624-3000
Facsimile: (757) 624-3169
senoona@kaufcan.com

Nathan W. McCutcheon (VSB #36308)
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Telephone: (202) 739-3000
Facsimile: (202) 739-3001
nmccutcheon@morganlewis.com

Daniel Johnson, Jr.
Michael J. Lyons
Dion M. Bregman
Ahren C. Hoffman
Michael F. Carr
Lorraine M. Casto
Jason Gettleman
MORGAN, LEWIS & BOCKIUS, LLP
2 Palo Alto Square
3000 El Camino Real, Suite 700
Palo Alto, CA 94306-2122
Telephone: (650) 843-4000
Facsimile: (650) 843-4001
djjohnson@morganlewis.com
mlyons@morganlewis.com
dbregman@morganlewis.com
ahoffman@morganlewis.com
mcarr@morganlewis.com
lcasto@morganlewis.com
jgettleman@morganlewis.com

Brett M. Schuman
MORGAN, LEWIS & BOCKIUS, LLP
One Market, Spear Street Tower
San Francisco, CA 94105
Telephone: (415) 442-1000
Facsimile: (415) 442-1001
bschuman@morganlewis.com

Counsel for Plaintiff

/s/_____
Gregory N. Stillman (VSB #14308)
HUNTON & WILLIAMS LLP
500 East Main Street, Suite 1000
Norfolk, VA 23510
Telephone: (757) 640-5300
Facsimile: (757) 625-7720
gstillman@hunton.com

Counsel for Defendants